

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

MARK MONDRAGON,

Plaintiffs,

Case No. 1:21-cv-00427 KK/JHR

vs.

**RIO RANCHO PUBLIC SCHOOLS
BOARD OF EDUCATION, *et al.*,**

Defendants.

and

SARAH MONTOYA,

Plaintiffs,

Case No. 1:21-cv-00648 KK/JHR

vs.

**RIO RANCHO PUBLIC SCHOOLS
BOARD OF EDUCATION, *et al.*,**

Defendants.

and

ANGELA SALAZAR,

Plaintiffs,

Case No. 1:21-cv-00751 KK/JHR

vs.

**RIO RANCHO PUBLIC SCHOOLS
BOARD OF EDUCATION, *et al.*,**

Defendants.

JOINT MOTION FOR AMENDED SCHEDULING ORDER

COME NOW The Parties, by and through undersigned counsel, and hereby submit their Joint Motion for an Amended Scheduling Order, and in support state as follows:

1. The above-captioned cases were consolidated on December 8, 2022. [Doc. 49].
2. On November 4, 2022, the Parties to all cases participated in a Joint Settlement Conference, however, a settlement was not reached.
3. On December 7, 2022, the Parties filed a Joint Motion to Consolidate [Doc. 48], due to the common questions of law and fact, and the benefits to expedite discovery.
4. Discovery in these matters has been ongoing, and the parties are diligently continuing to participate in discovery.
5. Due to the complex nature of the consolidated litigation, the parties agree that an Amended Scheduling Order is necessary to complete discovery and prepare for trial.
6. There is currently no scheduling order in place, and the parties agree that an Amended Scheduling Order is appropriate.
7. The parties therefore respectfully request that the Court enter a new scheduling order with the following deadlines:
 - a. Plaintiff's Rule 26(a)(2) expert disclosure: February 1, 2023.
 - b. Defendants' Rule 26(a)(2) expert disclosure: March 15, 2023.
 - c. Termination date for discovery: June 22, 2023 (except for expert depositions).
 - d. Motions relating to discovery to be filed by: June 30, 2023.
 - e. Expert depositions to be conducted by: July 19, 2023.
 - f. Pretrial motions other than discovery motions (including motion which may require a Daubert hearing) filed by: August 21, 2023.
 - g. Pre-Trial Order deadline to be set by the Court.

WHEREFORE, the parties respectfully request that the Court issue an Amended Scheduling Order as described herein.

Respectfully submitted:

WALZ AND ASSOCIATES, P.C.

/s/ Jerry A. Walz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of January, 2023, I filed the foregoing electronically through the CM/ECF system which caused all parties of record to be served by electronic mail, as more fully reflected in the Notice of Electronic Filing.

/s/ Jerry A. Walz

Jerry A. Walz, Esq.